

November 17, 2019

BY ECF

The Honorable Alvin K. Hellerstein
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Girl Scouts of the United States of America v. Boy Scouts of America*, No. 18-cv-10287

Dear Judge Hellerstein:

Plaintiff Girl Scouts of the United States of America (“GSUSA”) and defendant Boy Scouts of America (the “BSA”), the parties in the above-captioned proceeding, jointly write to request a short extension of pending deadlines in order to allow the parties to complete certain open items.

The parties have worked diligently to meet the current fact discovery deadline of November 20, 2019, and the vast majority of fact discovery has been completed. However, due to circumstances beyond the parties’ control involving witness availability, a few depositions scheduled to take place near the end of the current discovery period need to be postponed briefly into the latter part of November and/or December. The parties are also in the process of making their final supplemental document productions and written discovery responses, which work is estimated to be completed in December as well. There are also several third parties that have yet to produce documents. With the fact discovery deadline being extended, the parties agree that the corresponding expert survey exchange date, Court-ordered settlement conference, and second Case Management Conference, should be continued as well.

Therefore, pursuant to Your Honor’s Individual Practices Rule I.D. and the Civil Case Management Plan (Dkt. 28, ¶¶ B.1 & E), the parties jointly request a brief extension of these deadlines, as set forth in the chart below. Good cause exists for this requested extension for the reasons set forth above. This is the second joint request by the parties for an extension of the fact discovery schedule. *See* Dkt. 46.

The specific dates relevant to this extension are set forth below:

<u>EVENT</u>	<u>CURRENT DATE</u>	<u>REQUESTED EXTENSION</u>
Non-expert discovery deadline: ¹	November 20, 2019	December 20, 2019
Exchange of expert reports showing the results of any consumer surveys:	November 22, 2019	December 19, 2019
Meeting, for at least two hours at the office of plaintiff's counsel to discuss settlement:	December 5, 2019	January 14, 2019
Second Case Management Conference:	December 6, 2019	January 15, 2019

We thank the Court in advance for its consideration of these issues.

Respectfully Submitted,

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Respectfully Submitted,

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¹ No additional document requests, interrogatories, requests to admit or third-party subpoenas can be served, no additional depositions other than the remaining scheduled depositions, and the six pending depositions that require rescheduling, shall be taken, absent agreement of the parties.